Deficiency Progress Report – Update 3

Report Submitted: 9-30-08

CUPA Name: Petaluma City Fire Department

Evaluation Date: January 24, 2008

Evaluation Team:

Cal/EPA Team Leader: Kareem Taylor

Corrected Deficiencies: 1

Next Progress Report (Update 4) Due: January 19, 2009

Please update the deficiencies below that remain outstanding.

1. **Deficiency:** The CUPA did not report the number of routine inspections that return to compliance (RTC) on its Annual Inspection Summary Reports (Report 3s) for FYs 05/06 and 06/07. The Annual Enforcement Summary Reports (Report 4s) for both FYs show that facilities were cited for violations.

Preliminary Corrective Actions: none

Cal/EPA's 1st Response: This deficiency was corrected during the evaluation.

- **2. Deficiency:** The CUPA's narrative self audit does not adequately summarize the effectiveness of its activities. These activities include, but are not limited to the following:
 - permitting
 - inspections
 - enforcement
 - single fee system

Preliminary Corrective Actions: By September 30, 2008, the CUPA will complete a narrative self audit that adequately summarizes the effectiveness of its activities. Submit the CUPA's FY 07/08 self audit to Cal/EPA along with its FY 07/08 Annual Summary Reports.

CUPA's 1st Status Update (4-7-08): As stated above the CUPA will assure that the next self audit will include an overview of the "effectiveness of its activities". A copy of the CUPA's FY 07/08 self audit

will be submitted to Cal/EPA along with its FY 07/08 Annual Summary Reports.

Cal/EPA's 1st Response: On the next progress report, state whether or not the CUPA would like Cal/EPA to provide any sample self audits to assist in the development of Petaluma's narrative self audit.

CUPA's 2nd Update (6-25-08): No change from the 4/7/08 response. As the CUPA prepares for the next annual report/self audit, we will assure that the items noted in this deficiency will be corrected.

Yes, please provide any sample self audit narratives you may have that would assist with assuring our documents are correct.

Cal/EPA's 2nd Response: Cal/EPA will send the CUPA some sample self audits in a separate email.

CUPA's 3rd Update: (9-30-08): Thank you for the sample audit narratives. They were reviewed and were helpful. The self audit for FY 07/08 is a little behind schedule. The Annual report was sent in on time, but the final elements of the self audit are still under review. Once the self audit is complete, a copy will be sent to Cal/EPA. When this is accomplished, it is anticipated that this deficiency will be considered corrected.

Cal/EPA's 3rd Response: Please submit the CUPA's FY 07/08 narrative self audit to Cal/EPA as soon as it is completed. Also, please contact Cal/EPA by email or phone to provide the approximate completion date of the self audit.